

FILED**UNITED STATES DISTRICT COURT**

SEP 25 2020

for the

Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MC DEPUTY CLERK

United States of America

v.

Hugo MEDINA

Case No.

2:20-m-01666,001

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2020 in the county of Val Verde in the
Western District of Texas, the defendant(s) violated:*Code Section*

18 USC 554

Offense Description

18 USC 554, Whoever fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.*Complainant's signature*

Robert Parry, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

25
09/24/2020*Judge's signature*

City and state:

Del Rio, Texas

Honorable Collis White, U.S. Magistrate Judge

Printed name and title

2:20-m-01666,001

Attachment A

On September 24, 2020, at approximately 1440 hours, Hugo MEDINA was encountered at the Del Rio, Texas Port of Entry by Customs and Border Protection (CBP) personnel conducting south bound operations as he was exiting the United States. MEDINA was operating a tan Nissan Sentra passenger car bearing Mexico license plate FMX-15-22 and was accompanied by his minor daughter. CBP Officer Barrera obtained a negative declaration from MEDINA when she questioned if he was transporting money, guns, or ammunition out of the United States to Mexico. CBP Officer Barrera selected the vehicle MEDINA was operating for further inspection due to what she deemed to be suspicious behavior by MEDINA and his minor child.

Upon searching the vehicles trunk CBP officers located a large amount of ammunition concealed inside cloth "gym" bags in the trunk. In total 10,498 rounds of assorted ammunition were recovered and seized from the trunk compartment of the vehicle.

During a post Miranda interview MEDINA stated he did not possess a license to sell or transport bulk ammunition and he was aware that transporting ammunition into Mexico was illegal. MEDINA advised he had been recruited by a subject in Ciudad Acuna, Coahuila, Mexico to transport the ammunition from Del Rio, Texas to Ciudad Acuna and was to be paid \$2,000.00 upon successful delivery of the ammunition to this subject. MEDINA further advised he had been given the lock combination and a key to use at AA-AA Storage (Located at 601 Ave. G Del Rio, Texas 78840) to open a storage unit where the ammunition would be located. MEDINA stated he traveled to Triple AA-AA Storage as instructed and retrieved the ammunition from the storage unit as instructed.